

MDL 1570 PLAINTIFFS' EXECUTIVE COMMITTEES

In re: Terrorist Attacks on September 11, 2001 (S.D.N.Y.)

Plaintiffs' Executive Committee for Personal Injury and Death Claims	Plaintiffs' Executive Committee for Commercial Claims
Ronald L. Motley (1944-2013) Jodi Westbrook Flowers, <i>Co-Chair</i> Donald A. Migliori, <i>Co-Chair</i> Robert T. Haefele, <i>Liaison Counsel</i> MOTLEY RICE LLC	Stephen A. Cozen, <i>Co-Chair</i> Sean Carter, <i>Co-Chair</i> J. Scott Tarbutton, <i>Liaison Counsel</i> COZEN O'CONNOR

VIA ECF

April 25, 2025

The Honorable George B. Daniels, U.S. District Judge
United States District Court for the S.D.N.Y.

Daniel P. Moynihan U.S. Courthouse
500 Pearl Street
New York, NY 10007

Re: *In Re: Terrorist Attacks on September 11, 2001, 03 MDL 1570 (GBD) (SN)*

Dear Judge Daniels:

The Plaintiffs' Executive Committees and counsel for the *Ashton* Plaintiffs ("Plaintiffs") are continuing to file publicly (in successive tranches) the Exhibits to Plaintiffs' briefs and averments in opposition to Saudi Arabia's motion to dismiss. *See e.g.* ECF Nos. 9885, 9936, 9944, 9973, and 10199. Pursuant to the Court's July 29, 2024 Order, ECF No. 10173, all of Plaintiffs' Exhibits are "judicial documents" to which public access attaches, *Id.* at 9-11, and Plaintiffs are filing them publicly as soon as practicable, subject to only "limited redactions," *Id.* at 1.

Further to Plaintiffs' meet-and-confer process with DOJ/FBI, Plaintiffs are proceeding to file on the public docket certain judicial documents containing material originally produced subject to the FBI protective order. These exhibits comprise documents with FBI production numbers, which are now "Redacted for Public Filing" to comply with the Court's orders.

Plaintiffs are filing the following four (4) judicial documents with FBI production ranges on the public docket as attachments to the present letter:

Attachment to ECF filing	Pls. Exhibit No.	Bates / Production No.
(1)	Pls. Ex. 679B_ppr	MPS2023-095* (corresponding with FBI 1331-37)
(2)	Pls. Ex. 679G_ppr	FBI 3984-85
(3)	Pls. Ex. 679H_ppr	FBI 4243
(4)	Pls. Ex. 679J_ppr	FBI 8023-60

* In accordance with DOJ/FBI's stated position, FBI production ranges that originated from the MPS will be replaced in public filings with the directly-corresponding MPS production ranges. *

The Honorable George B. Daniels
April 25, 2025
Page 2

Plaintiffs are filing these documents with certain provisional redactions, including: provisional redactions to telephone numbers and other data; and provisional redactions requested by the FBI in the course of reviewing the documents for public filing.

All Plaintiffs' judicial documents that include Plaintiffs' provisional redactions ("ppr") are subject to Plaintiffs' reservation of rights to challenge later. ECF No. 9885.

Respectfully submitted,

MOTLEY RICE LLC

By: /s/ Robert T. Haefele
ROBERT T. HAEFELE
28 Bridgeside Boulevard
Mount Pleasant, SC 29465
Tel.: (843) 216-9184
Email: rhaefele@motleyrice.com

For the Plaintiffs' Executive Committee for Personal Injury and Death Claims on behalf of the Plaintiffs

COZEN O'CONNOR

By: /s/ Sean P. Carter
SEAN P. CARTER
One Liberty Place
1650 Market Street, Suite 2800
Philadelphia, Pennsylvania 19103
Tel.: (215) 665-2105
Email: scarter1@cozen.com

For the Plaintiffs' Executive Committee for Commercial Claims on behalf of Plaintiffs

KREINDLER & KREINDLER LLP

By: /s/ James Gavin Simpson
JAMES GAVIN SIMPSON
485 Lexington Avenue
New York, New York 10017
Tel.: 212-687-8181
Email: gsimpson@kreindler.com

Attorneys for Ashton Plaintiffs

cc: The Honorable Sarah Netburn, U.S.M.J.
All Counsel of Record via ECF